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Honorable Jesse M. Furman United States District Judge United States District Court, Southern District of New York 40 Centre Street, Room 2202 New York, New York 10007

Re: In the Matter of the Complaint of Chris Perdomo et al

Civil Action No: 1:12-CV-09194-JMF

Dear Judge Furman:

This firm represents the claimant, SHEILA L. LILLEY, in regard to the above-captioned matter.

On the June 3, 2013 conference, this firm was directed to advise the Court whether Claimant intends to file a motion with respect to the legal question of whether a person without legal title can be considered an owner of a vessel for purposes of limitation of liability.

Since the conference counsel for petitioners exchanged several cases on this issue. Claimant's position is unchanged; however, factual discovery is needed before presenting this issue to the Court. As such, at this time, Claimant will not be moving to dismiss Joseph Lukic's Petition for Limitation for lack of standing.

Respectfully submitted,

LAF/ad

CC: Steven A. Steigerwald, Esq.

LAW OFFICE OF ANDREA G. SAWYERS